

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

DECLARATION OF TRICIA WINKLER

I, Tricia Winkler, do hereby declare as follows:

1. I am over the age of 18 and competent to sign this Declaration. I submit this Declaration for Defendant QuoteWizard.com, LLC ("QuoteWizard"). I make this Declaration based on my personal knowledge of QuoteWizard's corporate records and practices, and based upon my review of those records. If called as a witness, I could and would testify competently to the matters stated herein.

2. I am employed by QuoteWizard as Vice President of Call Operations. I am familiar with and have personal knowledge of QuoteWizard's business practices and records discussed herein in that role.

3. Based on my experience at QuoteWizard, I am familiar with QuoteWizard's practices for receiving, storing, and maintaining information about consumers who have made "do not call" requests.

4. Drips Holdings LLC ("Drips"), a company that QuoteWizard uses to send text messages on its behalf, prepares lists of consumers who have made "do not call" requests to Drips

and then sends those records to QuoteWizard. As part of discovery in this case, QuoteWizard has produced these “do not call” records prepared and sent by Drips to QuoteWizard from the beginning of QuoteWizard’s relationship with Drips to present, with confidential consumer data redacted.

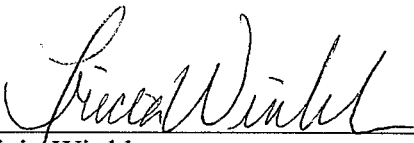
5. These “do not call” records reflect consumers who have consented to receive communications from QuoteWizard but who then requested no further contact. It is the functional equivalent of an “opt out.”

6. The “do not call” requests are not complaints from those consumers and do not indicate that the consumers did not originally consent to be contacted. The records reflect a consumer’s choice not to receive further communications.

7. Plaintiff Joseph Mantha did not make a “do not call” request or opt out after being contacted by Drips on behalf of QuoteWizard.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of December, 2020, at Sacramento, California.



Tricia Winkler
Vice President, Call Operations
QuoteWizard.com, LLC